

September 17, 2020

Greg Mattson  
Project Planning Manager  
San Diego County  
1600 Pacific Highway  
San Diego, CA 92101

**Re: Otay Ranch Resort Village – Village 13**

To Greg Mattson,

This letter is regarding the updated mitigation measures for greenhouse gas impacts from the proposed Otay Ranch Resort Village (Village 13). Thank you for the opportunity to comment on this project. In the month of August and September, California was ravaged by wildfires totaling 3.2 Million Acres of land and in San Diego County due to the Valley Fire, we lost 17,665 acres of land that contained vegetation that is required for carbon sequestration. In California as of September 13<sup>th</sup>, according to the European Centre for Medium – Range Weather Forecasts, the cumulative CO2 emissions from the fires in California, reached 83 million metric tons. With these recent turn of events, is it legitimate to expect that a carbon offset in northern California will last long enough to sequester the carbon emitted by the project? Please provide full detail in your answer.

According to research by Schwalm et al. 2020, currently, our world is on track under the climate project 8.5 RCP scenario (IPCC 2014). “A Fourth Assessment wildfire model suggests a 77% increase in mean and up to a 178% increase in maximum area burned by wildfires (compared to 1961-1990) by 2050, but the actual impacts could be substantially more severe because external factors such as wind are not yet incorporated,” according to California’s Climate Change Assessment that was released in 2018 (Thorne et al. 2018). With the likely scenario of the increased area of fires that occur at a higher frequency in the future, is it legitimate to expect that a carbon offset in northern California will last long enough to sequester the carbon emitted by the project? Please provide full detail in your answer by addressing future climate scenarios.

Executive order BB-55-18 for the State of California has mandated “moving the state to 100 percent clean energy by 2045.” As conditions are expected to worsen and fires are predicted to increase in frequency and severity in the future, will the proposed 30-year window on carbon offsets for the project conflict with executive order BB-5518 as elimination of the offset shortly after 2050 conflicts with the order?

Among the three project registries ACR, CAR and Verra, for the State of California, are there sufficient carbon offset projects available in San Diego? Are there any sufficient carbon offset projects available anywhere in California to meet the demands of this project? Please provide details with your answer.

Please notify me of future events, milestones, information, and opportunities to comment

related to this decision-making process as I can be reached at [Lesley.Handa@gmail.com](mailto:Lesley.Handa@gmail.com). Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lesley Handa', with a stylized flourish at the end.

Lesley Handa  
Handa Ornithology Lab

#### REFERENCES

IPCC, 2014: *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, R.K. Pachauri and L.A. Meyer (eds.)]. IPCC, Geneva, Switzerland, 151 pp.

Schwalm, C.R., Glendon, S. and Duffy, P.B., 2020. RCP8. 5 tracks cumulative CO<sub>2</sub> emissions. *Proceedings of the National Academy of Sciences*, 117(33), pp.19656-19657.

Thorne, James H., Joseph Wraithwall, Guido Franco. 2018. California's Changing Climate 2018. California's Fourth Climate Change Assessment, California Natural Resources Agency.